

# **Program Assistance Letter**

**DOCUMENT NUMBER: 2013-10** 

DATE: September 16, 2013

**DOCUMENT TITLE**: Look-Alike Program Update: On-Site Compliance Reviews for Initial Designation and Designation Period

Changes

**TO**: Look-alikes

Primary Care Associations
Primary Care Organizations
National Cooperative Agreements

### I. PURPOSE

The purpose of this Program Assistance Letter (PAL) is to communicate changes to the Health Resources and Services Administration (HRSA) look-alike initial designation application review process.

## II. LOOK-ALIKE INITIAL DESIGNATION SITE VISIT OVERVIEW

Effective upon issuance of this PAL, HRSA will routinely supplement reviews of initial designation applications submitted through HRSA's Electronic Handbook (EHB) with on-site assessments. On-site assessments are part of HRSA's overall program review process and will allow for a more robust assessment of operational status and compliance with Health Center Program requirements. Additionally, these assessments are expected to minimize delays in application reviews; identify areas in which HRSA can improve its look-alike technical assistance efforts; and better align the monitoring and oversight process for look-alikes with that of our health center grantees.

To assess their own compliance with program requirements, applicants may use the Health Center Site Visit Guide located at: <a href="http://bphc.hrsa.gov/administration/visitguidepdf.pdf">http://bphc.hrsa.gov/administration/visitguidepdf.pdf</a>.

## III. CHANGES TO INITIAL DESIGNATION APPLICATION PROCESSES

The initial designation application review process described in the Look-Alike Initial Designation Application Instructions 2013 located at <a href="http://bphc.hrsa.gov/about/lookalike/idinstructions.pdf">http://bphc.hrsa.gov/about/lookalike/idinstructions.pdf</a> is amended by this PAL as noted below.

# **Look-Alike Initial Application Review Process**

Prior to application submission, Primary Care Associations and HRSA staff are available to provide applicants with technical assistance by email or phone. Within the application submission, applicants must provide all information and documentation necessary to demonstrate eligibility and compliance with all Health Center Program requirements and provide additional documentation as necessary to support the on-site review. Please note that timeframes are approximate.

Look-Alike Initial Designation Application Review Process—Effective Upon	Approximate
Issuance of this PAL	Time Frame
1) <b>Preliminary Review</b> . HRSA will provide a preliminary review to assess eligibility and completeness of the application. HRSA will disapprove all incomplete or ineligible applications and notify the applicant through EHB of the reason for disapproval.	30 days
2) Compliance Review. If the application is determined through the preliminary review to be complete and eligible, HRSA will contact the applicant to schedule a two- to three-day on-site review to assess operational status and compliance with Health Center Program requirements. Site visits will typically be conducted by financial, administrative and clinical experts. All site visit reviewers will receive copies of the organization's look-alike application to support the on-site review. Reviewers may request additional documents and information to support their review, either prior to the visit or on-site. HRSA will share with the applicant the site visit report which will include a summary of Health Center Program compliance findings.	90 days
3) Optional Applicant Response. HRSA will allow applicants one optional and time-limited opportunity, typically no more than 30 days, to respond to noncompliance findings and to document that the identified areas of noncompliance have been met. If organizations choose to submit a response, HRSA may conduct a follow-up site visit to verify that all areas of noncompliance have been sufficiently addressed. Organizations that choose not to submit an interim response or that do not submit the response within the designated time frame will be disapproved but will be given full and fair consideration if they choose to submit a new look-alike initial designation application.	30 days, if applicable
4) <b>Look-Alike Determination</b> . HRSA staff will approve or disapprove the application based on the application submission, site visit review findings, and optional applicant response as applicable. Only eligible organizations that demonstrate compliance with all Health Center Program requirements will be approved.	
APPROXIMATE TOTAL	180 days

## **Look-Alike Application Determinations**

**Disapproval**. Organizations whose applications are disapproved will receive technical assistance that identifies the areas of noncompliance and the required actions to bring the organization into compliance with Health Center Program requirements.

Look-alike application disapproval is not appealable. However, organizations can re-apply for look-alike initial designation at any time, and all applications will receive full and fair consideration. HRSA strongly encourages applicants to discuss the application review findings with their Primary Care Association and/or HRSA staff before developing a new application.

**Approval**. Organizations whose applications are approved will receive a Notice of Look-Alike Designation through HRSA's EHB.

#### IV. DESIGNATION PERIOD LENGTH

In order to align with the program oversight process for Health Center Program grantees, newly-designated look-alikes will receive an initial three-year designation period and existing look-alikes will receive a maximum designation period of three years upon approval of their next Renewal of Designation application. This change in designation period length will not affect current look-alikes until the submission and review of their next Renewal of Designation application.

## V. ADDITIONAL INFORMATION

Additional information regarding look-alike initial designation is located at <a href="http://bphc.hrsa.gov/about/lookalike/index.html">http://bphc.hrsa.gov/about/lookalike/index.html</a> or by contacting the look-alike initial designation team at <a href="lookalike@hrsa.gov">lookalike@hrsa.gov</a> or 301-594-4300.

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